

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Richmond Division

VICTORIA L. FRAZIER,

Plaintiff

v.

CIVIL NO. 3:11cv497-JRS

**EXPERIAN INFORMATION
SOLUTIONS, INC., *et al.***

Defendants.

**PLAINTIFF'S OBJECTIONS TO DEFENDANT, LITTON LOAN SERVICING, L.P.'S
FIRST SET OF INTERROGATORIES**

COMES NOW the Plaintiff, **VICTORIA L. FRAZIER**, by counsel, as and for her objections to Defendant, Litton Loan Servicing, L.P.'s First Set of Interrogatories and states as follows:

PLAINTIFF'S OVERVIEW

1. Plaintiff does not agree to follow Defendant's "instructions" accompanying its discovery requests to the extent that they purport to impose duties inconsistent with duties proscribed by the Rules of Court and any discovery orders entered by the Court in this matter.
2. Plaintiff does not agree to use Defendant's proposed definitions to the extent the proposed definitions differ from the meaning of those words in common usage or as provided by the Rules of Court and any discovery orders entered by the Court in this matter.
3. Plaintiff 's responses are based upon the best information currently available to her. Plaintiff reserves the right to amend, supplement or correct her responses if and when she discovers other or additional information.

INTERROGATORY 22: Identify and set forth in specificity any and all investigations you performed prior to the commencement of this matter to ensure that the allegations contained therein were accurate, including the results of any investigations. In your response, identify all persons with knowledge of the facts set forth in this response, and identify all documents which relate to or support your response to this Interrogatory.

RESPONSE: *OBJECTION* – Plaintiff objects to Interrogatory #22 and will not answer it as it fully encroaches on the attorney-client privilege and as well seeks to discover the Plaintiff's and his counsel's work product.

INTERROGATORY 24: Identify and describe in detail all contact and communication since January 1, 2005 to date between you (or anyone acting on your behalf) and any person (including furnishers of information) other than Litton regarding any account that was reported as adverse in any of your consumer reports, credit reports or credit files. In your response, identify all persons with knowledge of the facts set forth in this response, and identify all documents which relate to or support your response to this Interrogatory.

RESPONSE: The Parties have agreed that neither party's discovery requests are to be understood as requesting information or documents provided by or to, generated by or exchanged with the responding party's respective counsel of record in this case.

OBJECTION – Plaintiff objects to Interrogatory #24 as overly broad and not calculated to lead to the discovery of relevant evidence because it seeks information going back over seven years. The Plaintiff has agreed to limit her own discovery requests to a period beginning January 1, 2009. Plaintiff will answer this Interrogatory with that same limitation, providing such information from January 1, 2009 forward.

Respectfully submitted,

VICTORIA L. FRAZIER

By _____
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above foregoing document has been forwarded via electronic mail and first class to the following counsel of record this 3rd day of February, 2012:

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